John Neil Stephenson (SBN 12497) 1 STEPHENSON LAW, PLLC 1770 Verdi Vista Court 2 Reno, Nevada 89523 3 T: 510-502-2347 E: johnstephensonlaw@gmail.com 4 W: stephensonfirm.com Counsel for Defendant Hacienda Rooming House, Inc. 5 dba Bella's Hacienda Ranch 6 UNITED STATES DISTRICT COURT 7 **DISTRICT OF NEVADA (RENO)** 8 9 JANE DOE; Case No. 3:24-cv-00065-MMD-CSD 10 Plaintiff, NOTICE OF UNAVAILABILITY & MOTION FOR A CONTINUANCE OF 11 TIME DURING THIS  $\mathbf{v}_{ullet}$ 12 UNAVAILABILITY ON BEHALF OF JOSEPH LOMBARDO, Governor of **DEFENDANT HACIENDA ROOMING** 13 Nevada, in his official capacity; AARON HOUSE, INC. D/B/A BELLA'S 14 FORD, Attorney General of Nevada, in his HACIENDA RANCH official capacity; NYE COUNTY; ELKO 15 **COUNTY; STOREY COUNTY; WESTERN** BEST, INC. D/B/A CHICKEN RANCH; 16 WESTERN BEST, LLC; DESERT ROSE 17 CLUB, LLC; HACIENDA ROOMING HOUSE, INC. D/B/A BELLA'S HACIENDA 18 **RANCH: MUSTANG RANCH** PRODUCTIONS, LLC d/b/a MUSTANG 19 RANCH LOUNGE, LLC; LEONARD 20 "LANCE" GILMAN, in his official capacity; and LEONARD "LANCE" 21 GILMAN, in his individual capacity, 22 Defendants. 23 24 /// 25 /// 26 /// 27 28

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## NOTICE OF UNAVAILABILITY & MOTION FOR A CONTINUANCE OF TIME DURING THIS UNAVAILABILITY ON BEHALF OF DEFENDANT HACIENDA ROOMING HOUSE, INC. D/B/A BELLA'S HACIENDA RANCH

Stephenson Law, PLLC, by and through its managing member, John Neil Stephenson, Esq. hereby gives notice that he is unavailable for all purposes, including phone calls, text messages, emails, filings, ex parte filings, orders and the likes, as he will be out of the country on a preplanned trip to Japan from <u>September 21, 2024 to October 12, 2024</u>.

Defendant Hacienda Rooming House, Inc. dba Bella's Hacienda Ranch hereby moves for a fifteen (15) day continuance of time to respond to any deadline that may arise during this period due to its counsel's unavailability.

DATED: September 16, 2024 STEPHENSON LAW, PLLC

John Neil Stephenson

By: John Neil Stephenson

Its: Managing Member Counsel for Defendant Hacienda Rooming House, Inc. dba Bella's Hacienda Ranch **CERTIFICATE OF SERVICE** 

I hereby certify that I electronically filed the foregoing, NOTICE OF

UNAVAILABILITY & MOTION FOR A CONTINUANCE OF TIME DURING THIS

UNAVAILABILITY ON BEHALF OF DEFENDANT HACIENDA ROOMING HOUSE, INC.

D/B/A BELLA'S HACIENDA RANCH by using the CM/ECF system on the date indicated below. To the best of my knowledge and belief, I certify that participants in the case are registered electronic filing system users and will be served via this Court's CM/ECF system.

DATED: September 16, 2024 STEPHENSON LAW, PLLC

By: John Neil Stephenson Its: Managing Member

Counsel for Defendant Hacienda Rooming House, Inc. dba Bella's Hacienda Ranch

John Neil Stephenson